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10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF WASHINGTON

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 vs.

15 SAMI ANWAR,
16 MID COLUMBIA RESEARCH, LLC,
17 ZAIN RESEARCH, LLC,

18 Defendants.

Case No.: 4:18-CR-6054-EFS

United States' Witness and Exhibit
Lists for Sentencing Hearing

19 The United States of America, by and through William D. Hyslop, United
20 States Attorney for the Eastern District of Washington, and Daniel Hugo Fruchter
21 and Tyler H.L. Tornabene, Assistant United States Attorneys for the Eastern
22 District of Washington, respectfully submits the following Exhibit and Witness
23 List for Sentencing.

24 The United States intends to call one witness at the Sentencing Hearing:
25 Diversion Investigator Craig Tom of the Drug Enforcement Administration. The
26 United States intends to offer into evidence the below exhibits during the
27 Sentencing Hearing. In order to keep the record clear, the exhibits for the
28 Sentencing Hearing are numbered starting at 501:

United States' Witness and Exhibit Lists for Sentencing Hearing – 1

<u>Ex. #</u>	<u>Admitted</u>	<u>Description</u>
501		ESD Overpayment Letter Bruinekool 7-27-2018
502		ESD Overpayment Letter to Bruinekool 10-2-2018
503		ESD Overpayment Statement to Bruinekool 1-7-2020
504		Image 0220- Texts between Yin and Bruinekool
505		Image 0221- Texts between Yin and Bruinekool
506		Image 0222- Texts between Yin and Bruinekool
507		Image 0223- Texts between Yin and Bruinekool
508		Image 1065- Photo of Pfizer Binder for Subject 1004
509		Image 1066- Photo of Pfizer Binder for Subject 1005
510		Image 1077- Photo of Pfizer Binder
511		Image 0379- Photo of Target with Bullet Holes
512		Image 0349- Photo of Note Re: WB
513		Photo of Phone Numbers
514		Photo Re: DK Binder
515		Photo Re: DK Death
516		Image 0167- Photo Re: Deportation

In addition, the United States may use exhibits, previously marked at trial, at the Sentencing Hearing. These include the following listed by their trial exhibit

number and whether or not they were admitted at trial, not admitted but stipulated to, or neither admitted nor stipulated to (i.e. “Marked”):

<u>Ex. #</u>	<u>Admitted</u>	<u>Description</u>
105	Admitted	ICON Payments Spreadsheet for Cholesterol Study
125	Stipulated	Ledger of Payments
140	Admitted	Payment Spreadsheet for Smoking Study
277	Marked	Written Statement of Justina Bruinekool 1-24-2018
347	Admitted	Medpace Checks to Mid-Columbia Research
352	Admitted	Site Payment Spreadsheet for Braeburn Study
378	Stipulated	Letter from WA DOH to Bruinekool
379	Admitted	WA License Plate BDW1291
380	Admitted	Yin DOL Registration
381	Admitted	Text from Fernandez to Garduno
386	Marked	Richland PD Report Re: Bruinekool
401	Marked	Transcript of Bruinekool Unemployment Hearing
417	Admitted	DEA Chart- Deposits from Braeburn Medpace to MCR
418	Admitted	DEA Table- Sponsor payments to ZR and MCR
419	Admitted	DEA Table- Summary ZR Open Invoices
420	Admitted	Zain Research Open Invoices
421	Marked	DEA Table- Summary General Ledger ZR Report 2014

422	Admitted	PPT Slide Chart- Revenue Summary ZR MCR 2014-17
423a	Admitted	Email re H1 B Employer Information form
423b	Admitted	Email attachment- H1 B Documents ZMR
424	Admitted	H1 B Documents 2015 Zain Tax Return
425	Stipulated	Miscellaneous Income – For Taxes
426	Admitted	Zain 2014 GL Spreadsheet
429	Admitted	Keybank Records No. 7574
431	Admitted	Keybank Records No. 2175
432	Stipulated	Keybank Records No. 4371
433	Stipulated	Keybank Records No. 4371
434	Admitted	Keybank Records No. 4371
435	Admitted	Keybank Records No. 4371
436	Stipulated	US Bank No. 9512
437	Stipulated	US Bank No. 6396
444	Marked	Bruinekool Subject Names Email

Per this Court's Notice Re: September 30th Sentencing Hearing (ECF No. 231), the Court has set aside 45 minutes for the hearing. However, the United States has been advised that at least five individual victims may be present and may wish to address the Court. In addition, Diversion Investigator Tom's testimony is anticipated to be 45 minutes to an hour. Accordingly, between any

1 defense presentation and sentencing arguments, the United States respectfully
2 requests that the Court set aside the morning for the Sentencing Hearing if
3 possible.

4 RESPECTFULLY SUBMITTED this 23rd day of September, 2020.
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6 William D. Hyslop
7 United States Attorney

8 s/ Tyler H.L. Tornabene
9 Daniel Hugo Fruchter
10 Tyler H.L. Tornabene
11 Assistant United States Attorneys
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CERTIFICATE OF SERVICE

I hereby certify that on September 23, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

John Gary Metro
Attorney at Law
719 Jadwin Avenue
Richland, Washington 99352

s/ Tyler H.L. Tornabene
Tyler H.L. Tornabene
Assistant United States Attorney